

FILED - USDC -NH
2023 NOV 27 PM 2:29

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

United States of America)

v.)

Court No. 1:21-cr-00041-JL

Ian Freeman,)

Defendant)

GOVERNMENT'S ASSENTED-TO MOTION TO SEAL

The government moves to seal the Exhibits in Support of Restitution, filed conventionally, as Exhibit 2 to the Government's Sentencing Memorandum, ECF No. 336, on September 1, 2023, at Level I, until further order of the Court. The attachments include photographs, financial records, personally identifiable information, descriptions of personal circumstances, and testimonials of crime victims. *See* Exhibit List, ECF No. 336, Exhibit 1. This information should be sealed indefinitely. The statute that lays out the procedure for issuance and enforcement of an order of restitution, 18 U.S.C. § 3664(d)(4), specifically provides that, "the privacy of any records filed, or testimony heard pursuant to this section shall be maintained to the greatest extent possible, and such records may be filed or testimony heard in camera." *Id.* The government mistakenly neglected to file a motion to seal these attachments at the time of filing. The defendant, through counsel, assents to this motion.

Date: November 27, 2023

Respectfully submitted,

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